

Rachel Steinback, SBN 310700
Law Office of Rachel Steinback
P.O. Box 291253
Los Angeles, CA 90029
(t) 213-537-5370
(f) 213-232-4003
(e) steinbacklaw@gmail.com

Carol A. Sobel, SBN 84483
Monique A. Alarcon, SBN 311650
LAW OFFICE OF CAROL SOBEL
725 Arizona Avenue, Suite 300
Santa Monica, CA 90401
(t) 310-393-3055
(e) carolsobel@aol.com
(e) monique.alarcon8@gmail.com

Attorneys for Plaintiffs.

[Additional Counsel on Following Page]

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PEÑA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

v.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF
ADELANTO, a municipal entity; GEO
LIEUTENANT DURAN, sued in her
individual capacity; GEO
LIEUTENANT DIAZ, sued in her
individual capacity; GEO
SERGEANT CAMPOS, sued in his
individual capacity; SARAH JONES,
sued in her individual capacity; THE
UNITED STATES OF AMERICA;
and DOES 1-10, individuals,

Defendants.

Case No. 5:18-cv-01125-SP

**DECLARATION OF MONIQUE A.
ALARCON IN SUPPORT OF
PLAINTIFFS' OPPOSITIONS TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OR, IN
THE ALTERNATIVE, PARTIAL
SUMMARY JUDGEMENT**

Filed Concurrently herewith:

1 Catherine Sweetser, SBN 271142
2 Kristina A. Harootun, SBN 308718
3 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
4 11543 W. Olympic Boulevard
5 Los Angeles, CA 90064
6 (t) 310-396-0731
7 (f) 310-399-7040
8 (e) csweetser@sshhlaw.com
9 (e) kharootun@sshhlaw.com
10

11 Colleen Flynn, SBN 234281
12 LAW OFFICE OF COLLEEN FLYNN
13 3435 Wilshire Boulevard, Suite 2910
14 Los Angeles, CA 90010
15 (t) 213-252-9444
16 (f) 213-252-0091
17 (e) cflynn@yahoo.com
18

19 Matthew Strugar, SBN 232951
20 LAW OFFICE OF MATTHEW STRUGAR
21 3435 Wilshire Boulevard, Suite 2910
22 Los Angeles, CA 90010
23 (t) 323-696-2299
24 (e) matthew@matthewstrugar.com
25
26
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DECLARATION OF MONIQUE A. ALARCON

I, Monique A. Alarcon, declare as follows:

I am an attorney-at-law at the Law Office of Carol A. Sobel. I am duly admitted to practice before this Honorable Court and am one of the attorneys of record for Plaintiffs in this action. I have personal knowledge of the facts set forth herein (except where indicated upon information and belief), and if called as a witness, could and would testify competently thereto. I am making this opposition declaration in support of Plaintiffs' Oppositions to Defendants' Motions for Summary Judgment.

1. Attached hereto as Exhibit 1 is the GEO Group Training Presentation on Use of Force.

2. Attached hereto as Exhibit 2 is all Plaintiffs' Administrative Segregation Orders.

3. Attached hereto as Exhibit 3 is the List of Grievances produced by Plaintiffs as P000199-200.

4. Attached hereto as Exhibit 4 is the General Incident Reports produced by GEO as GEO00283-00309.

5. Attached hereto as Exhibit 5 is the Dorm Officer Logbook from June 12, 2017 produced by GEO as GEO05119-05207.

6. Attached hereto as Exhibit 6 is Office of Civil Rights and Civil Liberties Complaint, filed by Nicole Ramos.

7. Attached hereto as Exhibit 7 are Plaintiffs' Medical Report on Injuries.

8. Attached hereto as Exhibit 8 is GEO Group Hunger Strike Response Plan.

9. Attached hereto as Exhibit 9 are true and correct copies of excerpts of the deposition transcript of GEO Person Most Knowledgeable Barry Belt, taken on August 12, 2019.

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1 10. Attached hereto as Exhibit 10 are true and correct copies of excerpts
2 of the deposition transcript of Person Most Knowledgeable Leo Marvin McCusker,
3 taken on September 24, 2019.

4 11. Attached hereto as Exhibit 11 are true and correct copies of excerpts of
5 the deposition transcript of Person Most Knowledgeable James Janecka, taken on
6 September 24, 2019.

7 12. Attached hereto as Exhibit 12 are true and correct copies of excerpts of
8 the deposition transcript of Person Most Knowledgeable Jesse Flores, taken on June
9 28, 2019.

10 13. Attached hereto as Exhibit 13 are true and correct copies of excerpts of
11 the deposition transcript of Person Most Knowledgeable Joanna Langill, taken on
12 August 20, 2019.

13 14. Attached hereto as Exhibit 14 are true and correct copies of excerpts of
14 the deposition transcript of Defendant Sergeant Giovanni Campos, taken on May 8,
15 2019.

16 15. Attached hereto as Exhibit 15 are true and correct copies of excerpts
17 of the deposition transcript of Defendant Lieutenant Jane Lynn Diaz, taken May 20,
18 2019.

19 16. Attached hereto as Exhibit 16 are true and correct copies of excerpts of
20 the deposition transcript of Officer Anthony Reyes, taken April 30, 2019.

21 17. Attached hereto as Exhibit 17 are true and correct copies of excerpts of
22 the deposition transcript of Officer Rodrick Gillon, dated May 13, 2019.

23 18. Attached hereto as Exhibit 18 are true and correct copies of excerpts of
24 the deposition transcript of Officer Rebecca Jindi, taken on June 14, 2019.

25 19. Attached hereto as Exhibit 19 are true and correct copies of excerpts of
26 the deposition transcript of Officer Frankie Juarez, taken on August 26, 2019.

27 20. Attached hereto as Exhibit 20 are true and correct copies of excerpts of
28 the deposition transcript of Officer Gilbert Martinez, taken on June 14, 2019.

1 21. Attached hereto as Exhibit 21 are true and correct copies of excerpts of
2 the deposition transcript of LVN Sarah Ann Jones, taken on June 27, 2019.

3 22. Attached hereto as Exhibit 22 are true and correct copies of excerpts of
4 the deposition transcript of Dr. Richard Medrano, taken on July 10, 2019.

5 23. Attached hereto as Exhibit 23 are true and correct copies of excerpts of
6 the deposition transcript of Plaintiff Isaac Antonio Lopez Castillo, taken on July 23,
7 2019.

8 24. Exhibit 24, the deposition transcript of Plaintiff Josue Mateo Lemus
9 Campos is not attached. Plaintiffs had a technical issue with this exhibit at 10:00
10 p.m. Plaintiffs will file a true and correct copy of excerpts of this deposition
11 transcript as early as possible on November 27, 2019 in order to not prejudice
12 Defendants. Plaintiffs are aware that Defendants are in possession of a copy.

13 25. Attached hereto as Exhibit 25 are true and correct copies of excerpts of
14 the deposition transcript of Plaintiff Julio Cesar Barahona Cornejo, taken on June
15 10, 2019.

16 26. Attached hereto as Exhibit 26 are true and correct copies of excerpts of
17 the deposition transcript of Plaintiff Jose Bladimir Cortez Diaz, taken on June 17,
18 2019.

19 27. Attached hereto as Exhibit 27 are true and correct copies of excerpts of
20 the deposition transcript of Plaintiff Omar Arnoldo Rivera Martinez, taken on June
21 6, 2019

22 28. Attached hereto as Exhibit 28 are true and correct copies of excerpts of
23 the deposition transcript of Plaintiff Alexander Antonio Burgos Mejia, taken on May
24 17, 2019.

25 29. Attached hereto as Exhibit 29 are true and correct copies of excerpts of
26 the deposition transcript of Plaintiff Luis Ernesto Pena Garcia, taken on June 4, 2019.

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1 30. Attached hereto as Exhibit 30 are true and correct copies of excerpts of
2 the deposition transcript of Plaintiff Marvin Josue Grande Rodriguez, taken on May
3 30, 2019.

4 31. Attached hereto as Exhibit 31 is Video Still, view C-1 at 6:30:51) and
5 was marked as Exhibit 2 to the Deposition of Officer Rebecca Jindi.

6 32. Attached hereto as Exhibit 32 is a true and correct copy of Plaintiff Pena
7 Garcia's Response No. 11 to GEO's Interrogatories to Plaintiff Pena Garcia, Set
8 One, dated February 8, 2019.

9 33. Attached hereto as Exhibit 33 is a true and correct copy of Plaintiff
10 Burgos Mejia's Response No. 11 to GEO's Interrogatories to Plaintiff Burgos Mejia,
11 Set One, dated February 8, 2019.

12 34. Attached hereto as Exhibit 34 is a true and correct copy of Plaintiff
13 Rivera Martinez's Response No. 11 to GEO's Interrogatories to Plaintiff Rivera
14 Martinez, Set One, dated February 8, 2019.

15 35. Attached hereto as Exhibit 35 is a true and correct copy of Plaintiff
16 Grande Rodriguez's Response No. 11 to GEO's Interrogatories to Plaintiff Grande
17 Rodriguez, Set One, dated February 8, 2019.

18 36. Attached hereto as Exhibit 36 is a true and correct copy of Plaintiff
19 Lopez Castillo's Response No. 11 to GEO's Interrogatories to Plaintiff Lopez
20 Castillo, Set One, dated February 8, 2019.

21 37. Attached hereto as Exhibit 37 is a true and correct copy of Plaintiff
22 Campos Response No. 11 to GEO's Interrogatories to Plaintiff Campos, Set One,
23 dated February 8, 2019.

24 38. Attached hereto as Exhibit 38 is a true and correct copy of Plaintiff
25 Barahona Cornejo's Response No. 11 to GEO's Interrogatories to Plaintiff Barahona
26 Cornejo, Set One, dated February 8, 2019.

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1 39. Attached hereto as Exhibit 39 is a true and correct copy of Plaintiff
2 Cortez Diaz's Response No. 11 to GEO's Interrogatories to Plaintiff Cortez Diaz,
3 Set One, dated February 8, 2019.

4 40. Attached hereto as Exhibit 40 is a true and correct copy of GEO's
5 Supplemental Response No. 79, in response to Plaintiffs' Request for Production,
6 Set Four, dated July 10, 2019.

7 41. Attached hereto as Exhibit 41 is Letter from Attorney Nicole Ramos to
8 Adelanto Detention Center produced by Plaintiffs as P000158-163.

9 42. Attached hereto as Exhibit 42 is Voicemail from Lieutenant Barry Belt
10 to Attorney Nicole Ramos produced by Plaintiffs as P000199-200.

11 43. Attached hereto as Exhibit 43 is Plaintiff Rivera Martinez's grievances
12 regarding phone number blocking produced by Plaintiffs as P000461 and by
13 Defendant GEO Group as GEO00146.

14 44. Attached hereto as Exhibit 44 is phone call recording of Plaintiff Rivera
15 Martinez.

16 45. Attached hereto as Exhibit 45 is Plaintiff Lopez Castillo list of blocked
17 phone numbers.

18 46. Attached hereto as Exhibit 46 is Water Temperatures at Adelanto
19 Detention Center.

20 47. Attached hereto as Exhibit 47 is Plaintiffs' Immigration and Customs
21 Enforcement Agency (ICE) Detention Orders.

22 48. Attached hereto as Exhibit 48 is American Civil Liberties Union letter
23 to Gabriel Valdez at ICE produced by Plaintiffs as P000010-14.

24 49. Attached hereto as Exhibit 49 is Declaration of Hussain Turk, dated
25 June 23, 2017, produced by Plaintiffs as P000447-448.

26 50. Attached hereto as Exhibit 50 is Plaintiffs' Grievances to ICE following
27 June 12, 2017 incident.

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51. Attached hereto as Exhibit 51 is Emails from Attorney Nicole Ramos to Immigration and Customs Enforcement Agency (ICE) officers produced by Plaintiffs as P00161-163.

52. Attached hereto as Exhibit 52 is the Intergovernmental Services Agreement between ICE and the City of Adelanto, accessed as a public record.

I declare under the penalty of perjury under that the foregoing is true and correct. Executed this 26th day of November, at Los Angeles, California.

/s/ Monique A. Alarcon

Monique A. Alarcon